

James R. Steffen (*pro hac vice*)  
Peter M. Routhier (*pro hac vice*)  
Faegre Baker Daniels LLP  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600

Calvin L. Litsey (CA SBN 289659)  
Calvin.Litsey@FaegreBD.com  
Faegre Baker Daniels LLP  
1950 University Avenue, Suite 450  
East Palo Alto, California 94303  
Telephone: (650) 324-6700  
Facsimile: (650) 324-6701

*Attorneys for Defendant  
Target Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

Indiezone, Inc., a Delaware corporation, and  
EoBuy, Limited an Irish private limited  
company,

Plaintiffs,

v.

Todd Rooke, Joe Rogness, Phil Hazel, Sam  
Ashkar, Holly Oliver and U.S. Bank,  
collectively the ***RICO Defendants***;

Jingit LLC., Jingit Holdings LLC., Jingit  
Financial, Services LLC., Music.Me, LLC.,  
Tony Abena, John E. Fleming, Dan  
Frawley, Dave Moorehouse II, Chris  
Ohlsen, Justin James, Shannon Davis, Chris  
Karls in their capacities as officers, agents  
and/or employees of the Jingit LLC.,  
***Defendants in Negligence, and Aiding/  
Abetting***;

Wal-Mart, General Electric, Target, DOE(s)  
and ROE(s) 1 through 10, ***Defendants in  
Negligence Secondary-Vicarious  
Infringement***,

Defendants.

CASE NO. 4:13-cv-04280-YGR

**REPLY IN SUPPORT OF DEFENDANT  
TARGET CORPORATION'S MOTION TO  
(1) DISMISS PLAINTIFF EOBUY, LIMITED  
AND (2) STAY ALL REMAINING  
PROCEEDINGS**

Hon. Yvonne Gonzalez Rogers

Date: April 22, 2014

Time: 2:00 p.m.

Place: Courtroom 1, 4th Floor

**REPLY IN SUPPORT OF MOTION TO DISMISS AND TO STAY**

Defendant Target Corporation (“Target”) submits this reply in support of its Motion to Dismiss plaintiff eoBuy, Limited and to stay the remaining claims against Target (ECF No. 76).

Target hereby joins, and incorporates by reference as if fully set forth herein, (1) the Reply of defendants Tony Abena, Sam Ashkar, Shannon Davis, John E. Fleming, Dan Frawley, Phil Hazel, Justin James, Jingit Financial Services, LLC, Jingit Holdings, LLC, Jingit LLC, Chris Karls, Dave Moorehouse, II, Music.Me LLC, Chris Ohlsen, Holly Oliver, Joe Rogness, Todd Rooke (ECF No. 60) including the declarations and other materials submitted in support thereof (ECF Nos. 61, 62); (2) the Reply of Defendant U.S. Bank National Association (ECF No. 63); and (3) the Joinder of Defendants General Electric and Walmart (ECF No. 74).

Dated: April 8, 2014

FAEGRE BAKER DANIELS LLP

By: /s/ Peter M. Routhier  
James R. Steffen (*pro hac vice*)  
Peter M. Routhier (*pro hac vice*)  
Faegre Baker Daniels LLP  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600

*Attorneys for Defendant  
Target Corporation*